REMARKS/ARGUMENTS

Upon entry of the above amendment, claims 12, 13, 19, 22, and 24 will have been amended, and claims 25-28 have newly been submitted for reconsideration by the Examiner. Claims 14, 15, 20, and 21 also are pending and are submitted for reconsideration by the Examiner. In view of the above, Applicant respectfully requests reconsideration of the outstanding rejections of all the claims pending in the present application. Such action is respectfully requested and is now believed to be appropriate and proper.

Initially, Applicant would like to express his appreciation to the Examiner for the detailed Official Action provided. Applicant also notes with appreciation the Examiner's acknowledgment of Applicant's Information Disclosure Statement filed in the present application on April 5, 2004 by the return of the initialed and signed PTO-1449 Form, and for consideration of the documents cited in Information Disclosure Statement.

Turning to the merits of the action, the Examiner has rejected claims 12-14, 19-20, 22, and 24 under 35 U.S.C § 103(a) as being unpatentable over AKATSU et al. (U.S. Patent 6,496,862) in view of LO et al. (U.S. Patent 6,324,178) and CARDILLO et al. (U.S. Patent 5,937,041).

As noted above, Applicant has amended claims 12, 13, 19, 22, and 24, and has submitted new claims 25-28. Thus, claims 12-15, 19-22, and 24-28 remain pending. Applicant respectfully traverses the above rejection based on these amended and pending claims and will discuss the outstanding rejection with respect to the amended and pending

claims in the present application as will be set forth hereinbelow. The amended claims merely clarify the subject matter recited in the canceled claims, but do not narrow the scope of the claims.

Applicant's claims 12-15 and 25 relate to a gateway apparatus at a transmitting side of a system that receives data from a transmitting apparatus that does not have an IP address, configures the data for Internet transmission, generates an Internet-frame based on the data received from the transmitting apparatus not having the IP address and based on an IP address which is assigned to a receiving apparatus. The IP address assigned to the receiving apparatus is input by an input device, and the transmitting apparatus not having the IP address does not have a capability of inputting the IP address. Claims 22 and 27 recite related methods.

On the contrary, as the Examiner admitted in the outstanding Official Action mailed on May 6, 2004, AKATSU et al. do not disclose the claimed controller which generates "an Internet-frame based on the data received from the transmitting apparatus and an IP address assigned to a receiving apparatus". As the Examiner also admitted in the above Official Action, AKATSU et al. do not teach that "the transmitting apparatus does not have an IP address". Further, AKATSU et al. cannot disclose the input device which inputs the IP address assigned to the receiving apparatus, with respect to data received from the transmitting apparatus not having the IP address, since AKATSU et al. do not disclose the transmitting apparatus not having the IP address.

Thus, AKATSU et al. do not disclose the claimed controller which generates an Internet-frame based on the data received from the transmitting apparatus not having the IP address and based on an IP address which is assigned to a receiving apparatus, the IP address assigned to the receiving apparatus being input by the input device.

Therefore, it is respectfully submitted that the features recited in Applicant's claims 12-15, 22, 25, and 27 are not disclosed in AKATSU et al. recited by the Examiner.

Regarding LO et al., the Examiner states that LO et al. teach a controller which generates "an Internet-frame based on the data received from the transmitting apparatus and an IP address which is assigned to a receiving apparatus". However, this is incorrect, as in LO et al., bridge circuit 220 receives a data packet from the first communication bus 240, and the data packet contains a header section 326, a data payload section 324, and a trailer section 322 (see, col. 6, lines 16-24). The data payload section 324 also includes a destination address (see, Fig.5 and col. 8, lines 32-38). In other words, in LO et al., the destination address is contained in the received data packet.

In direct contrast, in the present invention, the data, received from the transmitting apparatus not having an IP address, does not contain an IP address. According to the present invention, the IP address, assigned to a receiving apparatus, is input by an input device, since the transmitting apparatus not having an IP address does not have a capability of inputting the IP address. By the present amendment, Applicant has clarified this feature of the invention without narrowing the scope of the pending invention.

Thus, LO et al. do not disclose a controller which generates an Internet-frame based on the data received from the transmitting apparatus not having an IP address and based on an IP address which is assigned to a receiving apparatus, the IP address assigned to the receiving apparatus being input by the input device, the transmitting apparatus not having a capability of inputting the IP address. As noted above, the destination address of LO et al. is not input by an input device but is contained in the received data payload section.

Therefore, it is respectfully submitted that the features recited in Applicant's claims 12-15, 22, 25, and 27 are not disclosed in LO et al. cited by the Examiner or by any proper combination of AKATSU et al. and LO et al.

Regarding CARDILLO et al., the Examiner asserts that CARDILLO et al. disclose transmitting "requesting messages using apparatus that does not have IP address over the Internet (phone, col.4, lines 30-45)". However, in CARDILLO et al., telephone terminal 110 receives a "WEL-COME" message from NAV 130 and displays the "WEL-COME" message on screen-display 111. The "WEL-COME" message may include an individual or universal home-page from which users can begin their Internet access. From the home-page or "WEL-COME" screen, the user is permitted to make an Internet site selection by depressing a number on keypad 116 or selecting a soft key 113 corresponding to the URL to be accessed. The Internet data or content is displayed on screen-display 111. (see, Fig.1, Fig.2. Fig.4, col. 7, lines 50-67, col. 8, lines 1-16) Thus, telephone terminal 110 of CARDILLO et al. at least has the capability of selecting a

URL, accessing the Internet, and displaying the Internet data by utilizing screen-display 111, soft-key 113, and keyboard 116. In other words, telephone terminal 110 actually inputs an IP address. On the other hand, in the present invention, the transmitting apparatus not having an IP address does not have a capability of inputting the IP address. Thus, the transmitting apparatus not having an IP address of the present invention clearly defines over telephone terminal 110 of CARDILLO et al.

Therefore, CARDILLO et al. do not disclose a controller which generates an Internet-frame based on the data received from the transmitting apparatus not having an IP address and based on an IP address which is assigned to a receiving apparatus, the IP address assigned to the receiving apparatus being input by the input device, the transmitting apparatus not having a capability of inputting the IP address.

Therefore, it is respectfully submitted that the features recited in Applicant's claims 12-15, 22, 25, and 27 are not disclosed in CARDILLO et al. cited by the Examiner or by the combination of AKATSU et al., LO et al., and CARDILLO et al. There is no proper motivation for combining the network system controller of AKATSU et al. with the bridge circuit of LO et al. and the Internet interfaced telephone of CARDILLO et al.

Applicant's claims 19-21 and 26 relate to a gateway apparatus at a receiving side of a system that receives an Internet-frame including an IP address corresponding to a receiving apparatus that does not have an IP address and data from the transmitting apparatus, searches the memory for the receiving apparatus not having the IP address to which the data is to be transferred, based on the IP address included in the Internet-frame,

and transfers the data to the receiving apparatus not having the IP address. Further, the gateway apparatus has a memory which stores an IP address corresponding to the receiving apparatus not having the IP address and an application program. The application program converts received data into data which the receiving apparatus not having the IP address can interpret. Accordingly, the controller converts the received data into data which the receiving apparatus not having the IP address can interpret, by utilizing the application program in the memory, when the received data is data which the receiving apparatus not having the IP address can not interpret. The application program relates to a property of the receiving apparatus not having the IP address, the property indicating at least a product type of the receiving apparatus not having the IP address. Claim 24 and 28 recite related methods.

As the Examiner admitted in the outstanding Official Action mailed on May 6, 2004, AKATSU et al. do not teach that " the receiving apparatus does not have an IP address; a memory that is configured to store an IP address corresponding to the receiving apparatus not having the IP address and an application program which converts received data into data which the receiving apparatus not having the IP address can interpret; and a controller that is configured to receive an Internet-frame including the IP address corresponding to the receiving apparatus not having the IP address and data from the transmitting apparatus, to search the memory for the receiving apparatus not having the IP address to which the data is to be transferred, based on the corresponding IP address included in the Internet-frame, and to transfer the data to the receiving apparatus not

having the IP address; wherein said controller converts the received data into data which the receiving data not having the IP address can interpret, by utilizing the application program in the memory, when the received data is data which the receiving apparatus not having the IP address can not interpret." Essentially then, the Examiner has admitted that AKATSU et al. lacks any teaching of e.g., the last three paragraphs recited in claim 19.

Therefore, it is respectfully submitted that the features recited in Applicant's claims 19-21, 24, 26, and 28 are not disclosed in AKATSU et al. cited by the Examiner.

Regarding LO et al., in the above outstanding Official Action, the Examiner states that LO et al. taught a memory which stores "an application program which converts received data into which the receiving apparatus can interpret (col. 6, lines 18-21, col. 8, lines 32-43)". However, LO et al. merely discloses that "if a MAC to IP or vice-versa translation is required, then step 525 performs the translation based on look-up tables (LUTs) stored and maintained by the bridge circuit 220 within memory unit 430" (see, col. 8, lines 38-43 of LO et al.). In other words, LO et al. merely perform the translation from MAC to IP or vice-versa. This translation has no relation with the recitation of "the application program corresponding to a property of the receiving apparatus not having the IP address, the property indicating at least a product type of the receiving apparatus not having the IP address."

On the other hand, in the present invention, the application program is recited as being related to a property of the receiving apparatus not having the IP address, and the

property indicates at least a product type of the receiving apparatus not having the IP address, such as e.g., a scanner or a color printer (see, claim 21 and Fig. 3). By the present amendment, Applicant has clarified this feature of the invention without narrowing the scope of the pending invention. Thus, LO et al. do not disclose a memory that is configured to store an application program which converts received data into data which the receiving apparatus not having the IP address can interpret, the application program being related to a property of the receiving apparatus not having the IP address, the property indicating at least a product type of the receiving apparatus not having the IP address. LO et al. also do not disclose a controller that is configured to convert the received data into data which the receiving apparatus not having the IP address can interpret, by utilizing the application program in the memory, when the received data is data which the receiving apparatus not having the IP address cannot interpret.

Therefore, it is respectfully submitted that the features recited in Applicant's claims 19-21, 24, 26, and 28 are not disclosed in LO et al. recited by the Examiner or by the combination of AKATSU et al. and LO et al.

Regarding CARDILLO et al., the Examiner states that CARDILLO et al. disclose transmitting "requesting messages using apparatus that does not have IP address over the Internet (phone, col.4, lines 30-45)". However, as explained above, telephone terminal 110 of CARDILLO et al. can receive Internet data or content and can display them on screen-display 111. (see, Fig.1, Fig.2. Fig.4, col. 7, lines 50-67, col. 8, lines 1-16 of CARDILLO et al.) In other words, telephone terminal 110 of CARDILLO et al. has at

least the capability of selecting a URL, accessing the Internet, and displaying the Internet data. Thus, the receiving apparatus not having an IP address of the present invention is distinct from telephone terminal 110 of CARDILLO et al.

Further, CARDILLO et al. do not disclose a memory that is configured to store an application program which converts received data into data which the receiving apparatus not having the IP address can interpret, the application program being related to a property of the receiving apparatus not having the IP address, the property indicating at least a product type of the receiving apparatus not having the IP address. LO et al. also do not disclose a controller that is configured to convert the received data into data which the receiving apparatus not having the IP address can interpret, by utilizing the application program in the memory, when the received data is data which the receiving apparatus not having the IP address cannot interpret.

Therefore, it is respectfully submitted that the features recited in Applicant's claims 19-21, 24, 26, and 28 are not disclosed in CARDILLO et al. cited by the Examiner or by the combination of AKATSU et al., LO et al., and CARDILLO et al.

The combination of AKATSU et al., LO et al., and CARDILLO et al. is also clearly distinct from the pending claims, since each of AKATSU et al., LO et al., and CARDILLO et al. lacks at least the above features recited in Applicant's claims. Thus, the pending claims are submitted to be patentable over the Examiner's proposed combination. and are not obvious to one of ordinary skill in the art at the time the invention was made.

Moreover, the Examiner has not set forth a proper motivation for combining the features of these references. In this regard, LO et al. and AKATSU et al. relate to IEEE 1394 compliant serial communications, while CARDILLO et al. relate to ADSI for an Internet enabled telephone. Moreover, AKATSU et al. relate to monitoring and controlling of nodes of a network via a gateway, while LO et al. relate to enabling communication across different standards by use of a bridge circuit.

Accordingly, Applicant respectfully requests reconsideration and withdrawal of the outstanding rejection and an indication of the allowability of all the claims pending in the present application in due course.

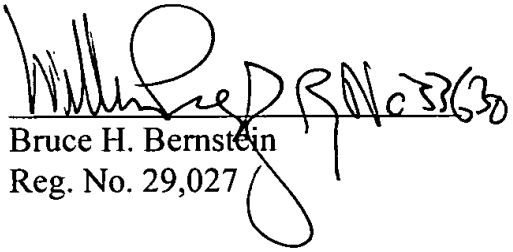
SUMMARY AND CONCLUSION

Applicant has made a sincere effort to place the present application in condition for allowance and believes that he has now done so. Applicant has amended several rejected claims, and has submitted the claims for reconsideration by the Examiner. With respect to the pending claims, Applicant has pointed out the features thereof and has contrasted the features of the new claims with the disclosures of the references. Accordingly, Applicant has provided a clear evidentiary basis supporting the patentability of all claims in the present application and respectfully requests an indication of the allowability of all the claims pending in the present application in due course.

Any amendments to the claims which have been made in this amendment, and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

Should the Examiner have any questions or comments regarding this Response, or the present application, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,
Kiyonori SEKIGUCHI



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